## **EXHIBIT A**

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: W.R. Grace & Co., <u>et al</u> .,	· . •·	) Chapter 11
		Case No. 01-01139 (JKF) (Jointly Administered)
	Debtors.	) Re: Docket No. 13406 )

## STIPULATION REGARDING JANUARY 2007 METHODOLOGY HEARING FOR ASBESTOS PROPERTY DAMAGE CLAIMS

The Debtors and the Official Committee of Asbestos Property Damage Claimants hereby stipulate and agree as follows:

- 1. The Court has issued pronouncements on the Methodology Issue (as described in the Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims of October 13, 2006, Dkt. No 13406)(hereinafter "Amended PD CMO") in footnote 103 of its December 14, 2006 ZAI Opinion (Dkt. No. 14014) and the parties agree that those pronouncements shall constitute the ruling of the Court as to the issues that are the subject of the Methodology Issue, and shall be applicable to the determination of the Debtors' objections to property damage claims which are the subject of the Amended PD CMO (the "Debtors' PD Claims Objections"). Accordingly, the hearing on the Methodology Issue, which had been scheduled for January 29, 30, and 31, 2007, shall be cancelled.
- 2. This agreement shall not affect the right of any party to appeal the determination of Debtors' PD Claims Objections on any grounds.
- 3. This agreement shall have no effect on ZAI Claimants and cannot be used by any party in connection with the ZAI Appeal.

4. All discovery and depositions related to the hearing on the Methodology Issue will be cancelled, however the parties reserve all of their rights with regard to discovery related to the adjudication phases for product identification, statutes of limitation and lack of hazard.

Dated: January 9, 2007

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